

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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*In the Matter of:*

Auburn Post Office  
Auburn, West Virginia 26325

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Docket No. A2011-94

UNITED STATES POSTAL SERVICE  
COMMENTS REGARDING APPEAL  
(November 22, 2011)

On September 28, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked September 22, 2011, from the Save the Auburn Post Office Committee and the Auburn Town Council (collectively, Petitioner) objecting to the discontinuance of the Post Office at Auburn, West Virginia. On September 29, 2011, the Commission issued a Form 56, Notice of Filing under 39 U.S.C. § 404(d). On September 30, 2011, the Commission issued Order No. 887, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 887, the administrative record was filed with the Commission on October 13, 2011. The Petitioner filed comments on October 27, 2011. The following is the Postal Service's answering brief in support of its decision to discontinue the Auburn Post Office.

The appeal and comments received by the Commission generally raise three main issues: (1) the effect on postal services, (2) the impact upon the Auburn community, and (3) economic savings. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition,

consistent with the Postal Service's statutory obligations and Commission precedent,<sup>1</sup> the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Auburn Post Office should be affirmed.

### **Background**

The Final Determination To Close the Auburn, WV Post Office and Continue to Provide Service by Rural Route Service, as well as the administrative record, indicate that the Auburn Post Office provides EAS-11 level service to 47 Post Office Box customers and no other delivery customers.<sup>2</sup> The Postmaster of the Auburn Post Office retired on January 30, 2010.<sup>3</sup> A temporary officer-in-charge (OIC) was installed to operate the office.<sup>4</sup>

The average number of daily retail window transactions at the Auburn Post Office is 45.<sup>5</sup> Revenue has been low and declining over the last few years: \$14,326.00 in FY 2008 (37 revenue units); \$13,300.00 in FY 2009 (35 revenue units); and \$11,241.00 in FY 2010 (29 revenue units).<sup>6</sup> The Auburn Post Office has no meter or permit customers.<sup>7</sup> Upon implementation of the final determination, delivery and retail services will be provided by rural route delivery administered by the Troy Post Office, an EAS-13

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<sup>1</sup> See 39 U.S.C. § 404(d)(2)(A).

<sup>2</sup> FD at 1; Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet ("Fact Sheet"). In these comments, specific items in the administrative record are referred to as "Item \_\_\_\_."

<sup>3</sup> The Petitioner asserts that the postmaster did not retire, but was promoted to a Level 18 office. Comments at 1. Upon further review, the Petitioner is correct, and contrary statements in the Administrative Record are in error. However, this circumstance does not affect the fact that the Auburn Post Office has been without a permanent postmaster since January 30, 2010, or any other material aspect of the discontinuance.

<sup>4</sup> FD at 1.

<sup>5</sup> FD at 1; Proposal at 2.

<sup>6</sup> FD at 1; Fact Sheet at 1; Proposal at 2.

<sup>7</sup> FD at 1; Fact Sheet at 1; Proposal at 2.

level office located 9.5 miles away, which has 37 available Post Office Boxes.<sup>8</sup> This service will continue upon implementation of the Final Determination.<sup>9</sup>

The Postal Service followed the proper procedures that led to the posting of the Final Determination. Issues raised by the customers of the Auburn Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means. Questionnaires were distributed to delivery customers of the Auburn Post Office. Questionnaires were also available over the counter for retail customers at the Auburn Post Office.<sup>10</sup> A letter from the Manager of Post Office Operations (Charleston, WV) was also made available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Auburn Post Office was warranted, and that effective and regular service could be provided through rural route delivery and retail services available at the Troy Post Office.<sup>11</sup> The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service they were receiving and the effects of a possible change involving rural route delivery.<sup>12</sup> The returned customer questionnaires appear in the administrative record in Item No. 22. In addition, representatives from the Postal Service were available at the Auburn

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<sup>8</sup> FD at 1; Fact Sheet; Proposal at 2.

<sup>9</sup> FD at 1.

<sup>10</sup> FD at 1; Item No. 20, Questionnaire Instruction Letter to Postmaster/OIC; Proposal at 2.

<sup>11</sup> Item No. 21, Cover Letter, Questionnaire, and Enclosure, at 1.

<sup>12</sup> *Id.*

Community Building for a community meeting on April 8, 2011, to answer questions and provide information to customers.<sup>13</sup>

Customers received formal notice of the Proposal and Final Determination through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the Auburn and Troy Post Offices from June 1, 2011, to August 2, 2011.<sup>14</sup> The Final Determination was posted at the Auburn and the Troy Post Offices starting on September 2, 2011, as confirmed by the round-dated Final Determination cover sheets that appear in the administrative record.<sup>15</sup>

In light of the postmaster vacancy, minimal workload, low revenue, the variety of delivery and retail options (including the convenience of rural delivery and retail service), the projected population decline in the area,<sup>16</sup> minimal impact upon the community, and the expected financial savings, the Postal Service issued the Final Determination.<sup>17</sup> Regular and effective postal services will continue to be provided to

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<sup>13</sup> *Id.*; FD at 1; Item No. 24, Community Meeting Roster; Item No. 25, Community Meeting Analysis; Proposal at 2. The Petitioner claims that “[a] second meeting was promised in the April [8] meeting and was not done.” Petitioner Comments at 1; Petition at 24. Without further specifics, it is difficult to determine the basis for this claim. In conjunction with Senator Joe Manchin, however, the District Manager held four public workshops on April 28 and 29 to discuss multiple Post Office discontinuances in the region. See Petition at 40 (Letter from Senator Joe Manchin III to Phyllis J. Grove, Chairman, Save the Auburn Post Office Committee, July 11, 2011). Thus, the Postal Service conducted additional meetings to discuss the Auburn Post Office discontinuance.

<sup>14</sup> FD at 1; Proposal at 1, 8.

<sup>15</sup> See United States Postal Service Notice of Filing, PRC Docket No. A2011-94, November 14, 2011.

<sup>16</sup> The Petitioner claims that population is increasing based on overall figures for Ritchie County. Petition at 20-21. County-wide averages are not necessarily indicative of trends in a particular small community, however: it is just as likely, if not more so, that populations are increasing in Harrisville, Pullman, and other local towns at a rate that outweighs declines in Auburn and elsewhere. The Petitioner has not presented community-specific data that contradict those in the Administrative Record. Item No. 16, Community Survey Sheet, at 2. Moreover, mentions of a potential new natural gas station, Petition at 20, Petitioner Comments at 1, provide little concrete basis for assumptions that Auburn’s population or economic trends will reverse themselves in the short or long term.

<sup>17</sup> See notes 3 through 8 and accompanying text; FD at 1-7; Proposal at 2-8; Item No. 16, Community Survey Sheet, at 2; Item No. 17, Alternate Service Options/Cost Analysis; Fact Sheet.

the Auburn community in a cost-effective manner upon implementation of the final determination.<sup>18</sup>

The issues raised by the Petitioner are addressed in the following paragraphs.

### **Effect on Postal Services**

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Auburn Post Office on postal services provided to Auburn customers. The closing is premised upon providing regular and effective postal services to Auburn customers.

The Auburn Post Office has minimal workload.<sup>19</sup> The Postal Service determines postmaster level and Post Office service hours by analyzing the workload of a Post Office. The Auburn Post Office serves 47 Post Office Box and no general delivery customers.<sup>20</sup> The Auburn Post Office has an average of 45 daily retail window transactions.<sup>21</sup> Upon the implementation of the Final Determination, delivery and retail services will be provided by rural route delivery emanating from the Troy Post Office. The window service hours of the Troy Post Office are from 8 a.m. to 12 noon and 12:30 p.m. to 4:15 p.m., Monday through Friday, and 8:30 a.m. to 10:15 a.m. on Saturday, with 37 Post Office Boxes available.<sup>22</sup>

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<sup>18</sup> FD at 1.

<sup>19</sup> FD at 1; Proposal at 2.

<sup>20</sup> FD at 1; Proposal at 2; Item No. 9, Worksheet for Calculating Workload Service Credit. If the Petitioner's generalized belief is accurate that the Auburn Post Office "had nearly 100 [rented Post Office Boxes] in the recent past," Petition at 7, then the intervening decline further illustrates the diminishing use of the Auburn Post Office's services.

<sup>21</sup> FD at 1; Proposal at 2; Item No. 10, Window Transaction Survey.

<sup>22</sup> FD at 1; Proposal at 2; Fact Sheet.

The effect of the closing of the Auburn Post Office on the availability of postal services to Auburn residents was considered extensively by the Postal Service.<sup>23</sup> Upon the implementation of the Final Determination, services provided at the Post Office, such as the sale of stamps, envelopes, postal cards, and money orders, will also be available from the carrier.<sup>24</sup> For carrier pick up of packages, customers can contact the Troy Post Office to let the carrier know that a package is available for pick up.<sup>25</sup> The carrier can deviate up to one-half mile from the line of travel in order to receive packages.<sup>26</sup>

With regard to the concern about obtaining accountable mail and large parcels, the carrier will attempt deliver to the customer's residence if the customer lives less than one-half mile from the line of travel.<sup>27</sup> If the customer lives over one-half mile away or is not home when delivery is attempted, a notice will be left in the mailbox.<sup>28</sup> Large parcels will be left outside the mailbox or at a location designated by the customer, or a notice will be left in the mailbox.<sup>29</sup> Attempted delivery items will be taken back to the Post Office.<sup>30</sup> Customers may pick up the Item at the Post Office or request redelivery online at usps.com or by calling 1-800-ASK-USPS.<sup>31</sup>

The Postal Service further explained that carrier service also is beneficial to many senior citizens and those who face special challenges because they do not have

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<sup>23</sup> FD at 1-7; Proposal at 2-8.

<sup>24</sup> FD at 3; Proposal at 4.

<sup>25</sup> FD at 5; Proposal at 5.

<sup>26</sup> *Id.*

<sup>27</sup> FD at 2; Proposal at 3.

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

to travel to the Post Office for service.<sup>32</sup> Customers are not required to travel to another post office to receive mail or obtain retail services.<sup>33</sup> These services will be provided by the carrier to a roadside mailbox located close to customers' residences.<sup>34</sup> In hardship cases, delivery can be made to the home of a customer if a request for a change in delivery method is submitted in writing to the Troy Postmaster.<sup>35</sup>

There was some concern regarding the time of day the carrier will deliver mail to customers' roadside boxes.<sup>36</sup> A customer's location on a carrier's line of travel determines the time of day mail is delivered.<sup>37</sup> Naturally, this precludes providing early delivery of mail to every customer.<sup>38</sup> The Postal Service explained, however, that it does carefully consider the volume of mail for each route so that the carrier can deliver the greatest amount of mail at the earliest possible hour, thereby balancing the goal to deliver as much mail as possible as early as possible with the need to minimize the travel distance a route must cover.<sup>39</sup>

In addition to carrier service, customers may opt for Post Office Box service at the nearby Troy Post Office. There are 37 Post Office Boxes available.<sup>40</sup> Based on general experience, it is unlikely that all 47 Auburn Post Office Box customers will seek

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<sup>32</sup> FD at 2-6; Proposal at 3-7.

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> *Id.* The Petitioner alleges that "hardship delivery has been denied in the past." Petitioner Comments at 1. It is difficult to comment on the circumstances of any past requests without further elaboration. At any rate, any exceptional anecdotes do not detract from the general principle that hardship delivery may be requested and granted where appropriate. It should be noted that the Postal Service's response in the Proposal and FD explained the criteria for approval of roads for delivery. FD at 5; Proposal at 5.

<sup>36</sup> FD at 2; Proposal at 3.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> FD at 1; Proposal at 2.

Post Office Boxes in Troy: a substantial number are likely to be content with the prospect of receiving rural delivery service. If the number of P.O. Boxes at the Troy Post Office proves not to meet the demand of Auburn customers, however, the Postal Service may install swivel units for additional P.O. Box access. Additionally, the Postal Service has offered to consider the option of centralized delivery through cluster box units (CBUs) and/or parcel lockers within the Auburn community. This would offer locked boxes for security and 24 hours access if located outdoors.<sup>41</sup>

Petitioner and customers raised the issue of mail security, including leaving money for transactions in the mailbox.<sup>42</sup> The Postal Service researched this risk with the Postal Inspection Service and found that there have been only two reports of mail theft or vandalism in the area.<sup>43</sup> The Postal Service also queried the Ritchie County Sheriff's Office and was advised that no recent complaints had been logged regarding the Auburn Post Office.<sup>44</sup> Customers were advised that they can put a lock on their mail box as long as the slot is large enough to accommodate their normal mail volume, and that customers can place a note in their mailboxes instructing the carrier to sound the horn upon arrival in order to conduct financial transactions.<sup>45</sup> As noted above, if a CBU and/or parcel locker is installed, it will contain locked mailboxes.

Petitioner also states that "[m]any Auburn patrons do not have bank accounts

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<sup>41</sup> FD at 1, 5, 8; Proposal at 2, 6, 8; Item No. 15, Post Office Survey Sheet, at 2. It should be noted that the one-time cost of CBU/parcel locker installation (\$1,200.00) was included in the savings estimate that appears in the Proposal and FD. FD at 7; Proposal at 8; Item No. 15, Post Office Survey Sheet, at 2.

<sup>42</sup> FD at 1, 2, 4; Proposal at 2, 3.

<sup>43</sup> Item No. 14, Inspection Service/local law enforcement vandalism report, at 1; FD at 4.

<sup>44</sup> Item No. 14, Inspection Service/local law enforcement vandalism report, at 2.

<sup>45</sup> FD at 1, 2, 4; Proposal at 2, 3.



and therefore must rely on money orders.”<sup>46</sup> Contrary to Petitioner’s assertions that it will be inconvenient for customers to purchase money orders from the rural carrier,<sup>47</sup> customer convenience may be enhanced upon implementation of the FD because the provision of rural carrier service will alleviate the need for customers to travel to the Post Office for retail services and will provide them with 24-hour access to their mail. The Postal Service has informed the Petitioner and others customers may purchase money orders by meeting the carrier at the mailbox, completing an application (which can be provided by the carrier), and paying the carrier the price of the money order, plus the fee.<sup>48</sup> The carrier gives the customer a receipt for the application, completes the money order upon his or her return to the Post Office, and leaves a money order receipt in the customer’s mailbox on the next delivery day.<sup>49</sup> Customers can provide the carrier with a stamped, self-addressed envelope in which the completed money order is mailed to its destination, and can request return of completed money orders for verification on the next delivery day.<sup>50</sup> As described above, customers can leave a note for carriers to sound the horn upon arrival if they prefer to conduct financial transactions in person.

Thus, the Postal Service has properly concluded that all Auburn customers will continue to receive regular and effective service via rural route delivery and the nearby Troy Post Office.

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<sup>46</sup> Petitioner Comments at 1.

<sup>47</sup> Petition at 1.

<sup>48</sup> FD at 3; Proposal at 4.

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

## Effect Upon the Auburn Community

The Postal Service is obligated to consider the effect of its decision to close the Auburn Post Office upon the Auburn community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Auburn is an unincorporated rural community located in Ritchie County.<sup>51</sup> The Ritchie County Sheriff's Department provides police protection, with fire protection provided by the Volunteer Fire Department.<sup>52</sup> The questionnaires completed by Auburn customers indicate that, in general, the retirees, self-employed persons, commuters, and others who reside in Auburn may travel elsewhere for work and for other supplies and services.<sup>53</sup>

The Petitioner's letter of appeal raises the issue of the effect of the closing of the Auburn Post Office upon the Auburn community. This issue was extensively considered

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<sup>51</sup> The Petitioner claims that Auburn is incorporated due to the existence of a town council, sidewalks, and street lights. Petitioner Comments at 1; Petition at 10. Follow-up research with the Ritchie County Clerk's Office confirms that Auburn is, in fact, unincorporated, notwithstanding the circumstances raised by the Petitioner. Even if the relevant statements in the Administrative Record were in error, such errors in technical community descriptions do not have a material impact on the legal factors at issue in this appeal. See FD at 6; Proposal at 6 ("The incorporated status of a town has no bearing on its requirements for postal services.").

<sup>52</sup> FD at 6; Proposal at 6; Item No. 16, Community Survey Sheet, at 1.

<sup>53</sup> FD at 6; Proposal at 6; see *generally* Item No. 22, Returned Customer Questionnaires and Postal Service Response Letters. If anything, the materials submitted by the Petitioner suggest that supplies and services are even less available in Auburn than might be suggested by the list of employers and civic organizations at page 6 of the FD. See Bob Weaver, "Thousands of Rural Post Offices Targeted for Closure: Former Auburn Postmistress Says It Saves Little Money," THE HUR HERALD (March 30, 2011) ("The Baptist Church resides on Main Street and nearby the town's last store is closed."), in Petition at 18; Denise Duelley, "Save Our Post Office!," RITCHIE GAZETTE & THE CAIRO STANDARD (April 13, 2011), at 5-A ("[The Post Office] is the last business here in this town. We lost all our business in 2003. Most left on account of the flood.") (quoting community meeting participant and former mayor), in Petition at 67.

by the Postal Service, as reflected in the administrative record.<sup>54</sup> The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name.<sup>55</sup> The record makes clear that the Postal Service is addressing this concern through preservation of the community identity by continuing the use of the Auburn name and ZIP Code in addresses.<sup>56</sup>

Communities generally require regular and effective postal services and these will continue to be provided to the Auburn community. The Postal Service noted that residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.<sup>57</sup>

In addition, the Postal Service has concluded that nonpostal services, and the information center typically provided by the Auburn Post Office, can be provided by the nearby Troy Post Office.<sup>58</sup> Government forms usually provided by the Post Office are also available by contacting local government agencies.<sup>59</sup>

The Petitioner's own submissions do not clearly contradict the Administrative Record about the degree to which Auburn residents are likely to visit the Troy Post Office. On the one hand, the Petitioner claims that "no one works in Troy, nor do they pass it on the way to work," and that "our schools are in Ritchie County not in Gilmer County where Troy is."<sup>60</sup> On the same page, however, the Petitioner asserts that

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<sup>54</sup> FD at 6; Proposal at 6-7.

<sup>55</sup> FD at 6; Proposal at 6.

<sup>56</sup> *Id.*

<sup>57</sup> FD at 6.

<sup>58</sup> FD at 6; Proposal at 6.

<sup>59</sup> FD at 6; Proposal at 6.

<sup>60</sup> Petition at 3.

residents shop in Glenville and Coxs Mills “mostly,” which are in Gilmer County.<sup>61</sup> In the same petition, the Petitioner submitted a Glenville newspaper editorial that avers that

many people living in the Auburn community work in Gilmer County. . . .  
[T]he people depend on getting Gilmer County news and advertisements.  
Finally, for many Auburn residents, it's easier to shop in Glenville and other locations in Gilmer County, which are much closer than Harrisville or Ellenboro.<sup>62</sup>

A search on Google Maps indicates that Troy is only a few miles past Coxs Mills on State Route 47, and a detour through Troy appears to add only about 5 miles to the drive between Auburn and Glenville. Thus, it is not apparent that Auburn customers will fail to be regularly and effectively served through the Troy Post Office. Of course, to the extent that customers do visit other towns in Ritchie County as the Petitioner indicates, customers may also choose to avail themselves of the Post Offices in those towns.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Auburn Post Office on the community served by the Auburn Post Office.

### **Economic Savings**

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that extending rural route carrier service would cost the Postal Service substantially less than maintaining the Auburn Post Office and would still

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<sup>61</sup> *Id.*

<sup>62</sup> “Editorial: Deceived by Feds: Auburn Post Office Has Apparently Been Closed ... Permanently,” THE GLENVILLE DEMOCRAT AND PATHFINDER (July 21, 2011), at 3, *in* Petition at 25.

provide regular and effective service.<sup>63</sup> The estimated annual savings associated with discontinuing the Auburn Post Office are \$47,804.00.<sup>64</sup>

The Petitioner questions the annual cost-of-replacement-service figure of \$3,630.00 because it does not account for the distance between Troy and Auburn and because of the Petitioner's skepticism as to whether "anyone [is] going to drive to Auburn and put up the mail for that amount[.]"<sup>65</sup> Delivery service would be provided to Auburn customers (additional to those already receiving such service) through an extension of the existing route, which originates in Troy. The extension is estimated to total an additional 2.0 miles.<sup>66</sup> Contrary to the Petitioner's apparent interpretation, the Postal Service does not plan to establish a new route from Troy that only serves Auburn customers not currently provided rural delivery service. Because the distance between Troy and Auburn is part of the route today, it would be inaccurate to include it in an estimate of additional service cost. Therefore, the estimate is reasonable.

The Petitioner questions the consistency of this proposal with statutory authority in Title 39 providing that, in the Petitioner's view, "rural post offices should not be penalized because they are not self-sustaining."<sup>67</sup> The Petitioner's comments suggest that the Petitioner believes this to prohibit the closure of Post Offices in *communities* that are not self-sustaining.<sup>68</sup> As indicated in the statutory text, however, the actual policy is aimed only at the financial standing of *Post Offices*, not of the surrounding

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<sup>63</sup> FD at 6-8; Proposal at 8; Item No. 21, Letter to Customer, at 1A.

<sup>64</sup> FD at 6-8; Proposal at 8.

<sup>65</sup> Petition at 10; Petitioner Comments at 1.

<sup>66</sup> Item No. 15, Post Office Survey Sheet, at 2.

<sup>67</sup> Petitioner Comments at 1.

<sup>68</sup> *Id.* ("The Auburn, Cox's Mills and Berea area is definitely a poor area.").

*communities* at large.<sup>69</sup> Moreover, in this case, a variety of factors have informed the decision to discontinue the Auburn Post Office, including a postmaster vacancy; minimal workload; low office revenue;<sup>70</sup> the variety of delivery and retail options (including the convenience of rural carrier delivery and retail service); minimal impact upon the community; and the expected financial savings.<sup>71</sup> The Postal Service then analyzed whether a maximum degree of effective and regular postal services to the area and community could be provided with rural delivery service in the absence of the Post Office, and the answer was affirmative.

Finally, the Petitioner speculates that the lease costs could be halved “if only [the Postal Service] asked.”<sup>72</sup> The Petitioner provides no foundation for this supposition. Moreover, personnel costs dwarf lease costs by a factor of six at the Auburn Post Office.<sup>73</sup> Thus, even if the facility’s lease costs were eliminated entirely, this would not nullify the fact that the discontinuance would result in significant cost savings.

Economic factors are some of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies,

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<sup>69</sup> 39 U.S.C. § 404(d)(2)(A)(iii) (providing that, in determining whether to close a Post Office, the Postal Service must consider whether such closing is consistent with the policy that the Postal Service provide “a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining”).

<sup>70</sup> See notes 4-6 and accompanying text. The Petitioner suggests that the revenue figures for the Auburn Post Office are artificially low because revenue received by the carrier from Auburn residents is not credited to the Auburn Post Office. Petition at 9. As the Petitioner notes, *id.*, this is because the carrier’s originating office is the Troy Post Office, not the Auburn Post Office. The local Highway Contract Route driver is stationed out of West Union. It is unclear why the Petitioner believes that revenue received by a carrier stationed at one Post Office should be credited to a different Post Office, with which the carrier is not associated. The revenue figures in the Administrative Record accurately reflect the revenue taken in by the Auburn Post Office.

<sup>71</sup> See notes 3 through 8 and 17 and accompanying text.

<sup>72</sup> Petitioner Comments at 10.

<sup>73</sup> FD at 8; Proposal at 8.

which is noted throughout the administrative record, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv).<sup>74</sup>

### **Effect on Employees**

As documented in the record, the impact on postal employees is minimal. The permanent postmaster position has been vacant since January 30, 2010. The pre-existing postmaster relief employee (PMR) was installed as the temporary officer-in-charge (OIC) to operate the office.<sup>75</sup> The OIC will be afforded another OIC opportunity or may be separated from employment.<sup>76</sup> The record shows that no other employee would be affected by this closing.<sup>77</sup> Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Auburn Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

### **Conclusion**

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Auburn Post Office on the provision of postal services and on the Auburn community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to

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<sup>74</sup> FD at 6-8; Proposal at 8.

<sup>75</sup> FD at 1, 6. Further internal research indicates that a temporary postmaster replacement (PMR) was appointed and later assigned as the OIC.

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

provide effective and regular service to Auburn customers. The Postal Service submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). Accordingly, the Postal Service respectfully requests that the determination to close the Auburn Post Office be affirmed.

Respectfully submitted,

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